

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

AARON JOHNSON,

Defendant.

UNDER SEAL

Case No. 1:21-MJ-13

AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT

I, Steve Donaghey, a Federal Agent with the Postal Inspection Service, being duly sworn, depose and state that:

INTRODUCTION

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”), and have been since November 2016. I am assigned to the Washington Division’s Mail Theft/Workplace Violence Team at the Merrifield, Virginia Domicile. My assignments include investigating individuals who are involved in mail theft and other federal violations. I have received specialized training and have participated in investigations relating to individuals who have stolen U.S. Postal Service (USPS) mail, generally, counterfeited and/or altered official documents, forged and/or uttered financial documents, and committed identity theft.

2. This affidavit is submitted in support of a criminal complaint and arrest warrant charging that from in or around December 2019 through in or around November 2020, in Arlington County, within the Eastern District of Virginia, and elsewhere, AARON JOHNSON did knowingly combine, conspire, confederate, and agree with others, known and unknown, to commit bank fraud, in violation of 18 U.S.C 1349.

3. The facts and information contained in this affidavit are based upon my training and experience, personal knowledge, and observation during the course of this investigation, as well as the observations of other law enforcement officers and/or inspectors involved in this investigation. This affidavit contains information necessary to support probable cause, but it is not intended to include each and every fact and matter observed by me or known to the United States.

PROBABLE CAUSE

4. The USPIS is investigating a series of mail thefts from collection boxes located outside of the post office at 2200 North George Mason Drive, Arlington, Virginia, 22207, within the Eastern District of Virginia. In early January 2020, several members of the Arlington community reported to postal management that their outgoing mail, placed inside those collection boxes, either did not reach their destination or contained personal checks that had been altered and cashed by someone other than the original payee.

5. On at least three occasions, victims whose checks were altered reported that they brought their outgoing mail into the North Arlington Post Office and either placed their envelope into the mail wall slot or handed it to a clerk behind the counter.

6. On or about January 15, 2020, a motion-activated camera was installed to capture mail theft at the collection boxes.

7. On the morning of February 4, 2020, the camera took a series of photographs, beginning at 12:21 a.m., that showed a black male exit the driver seat of a black Dodge Charger, bearing Maryland paper tag “226941T,” open one of the collection boxes with an Arrow key (a universal key used by authorized USPS personnel to access collection boxes, outdoor parcel lockers, cluster box units, and apartments panels), and empty the contents of the plastic postal tub

into the backseat of the vehicle. The male subject returned the plastic tub, closed the collection box, and drove away.



8. On or about February 12, 2020, I called USPIS's National Law Enforcement Communications Center and requested a registration check on Maryland paper tag "226941T." The registration returned to a 2019 Dodge Charger in the name of Miles Nehemiah Ward of 1410 Sacramento Street, Upper Marlboro, Maryland 20774.

9. On or about February 13, 2020, I requested a copy of Ward's Maryland driver's license photo through the Maryland Department of Motor Vehicles Association. Ward's driver's license information showed that he was a black male in his twenties and approximately six feet

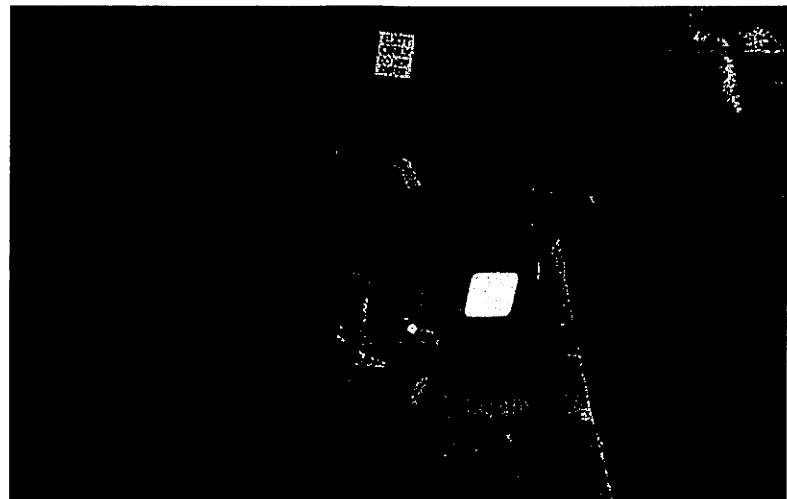
tall, matching the description of the male in the photos stealing the mail. The address associated with Ward on his Maryland license was 1410 Sacramento Street, Upper Marlboro, Maryland 20774.

10. On the morning of February 18, 2020, photographs taken by the motion-activated camera revealed an attempted mail theft. At 1:55 a.m., the black Dodge Charger, bearing Maryland paper registration "226941T," pulled up to the curb across from the blue collection boxes. From 1:55 a.m. until 2:22 a.m., approximately 40 photographs were taken of the same male subject seen in the previous mail theft attempting to steal the mail. The male subject used a key to open the first collection box. A photograph shows the subject removing the plastic mail bin, but there is no photograph of him placing the contents of the plastic bin in his vehicle. The male subject attempted to open the second collection box, but appeared to have gotten his key stuck in the lock. The subject made repeated attempts to retrieve it, before leaving the area at 2:22 a.m.





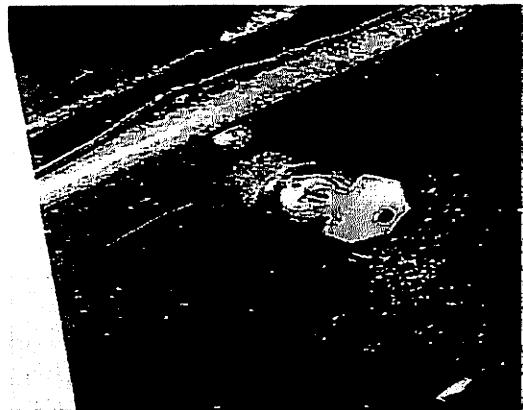
11. At 3:59 a.m. that same day, the camera took six photographs of two subjects wearing hooded sweatshirts approaching the mail box. The subjects retrieved the lodged key and exited the area.



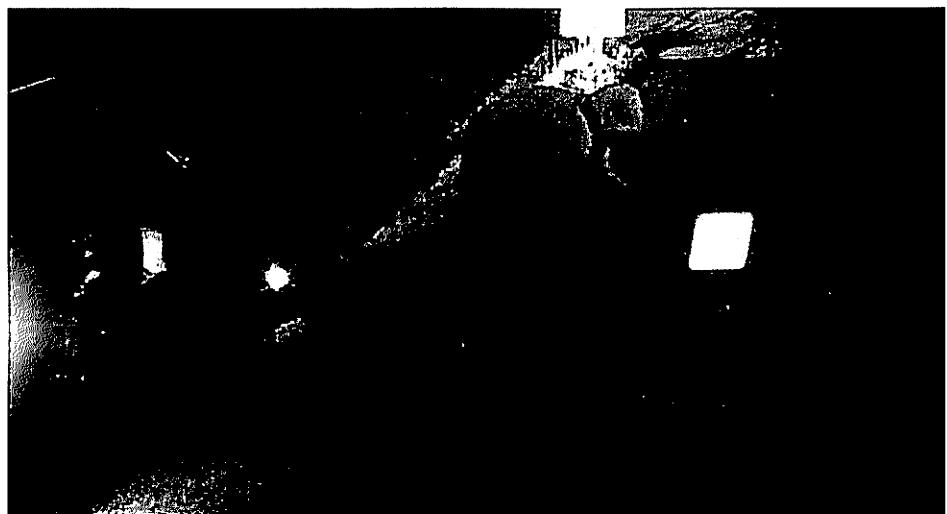
12. A USPS "arrow key," series # 248, which is the only series of arrow keys capable of opening blue collection boxes in Arlington, Virginia, was used by Ward to open the collection boxes on both occasions (February 4 and 18). An arrow key from the # 248 series can open any USPS Blue Collection Box in Arlington, Virginia.

13. On or about February 18, 2020, according to Ward's phone records, Ward made two outgoing phone calls at 2:08 a.m. and 2:21 a.m. after the "arrow key" became lodged in the lock of the collection box in Arlington, Virginia. Phone records revealed that those outgoing calls went to a telephone number where the account owner was identified as AARON JOHNSON. Further review of Ward's records indicated a total of 635 calls between Ward's telephone and JOHNSON's telephone number between January 1, 2019 and April 14, 2020.

14. In or around fall 2020, a detective with the Montgomery County Police Department (MCPD) shared relevant information with this investigator that was obtained by MCPD while investigating a fraud and homicide case. As part of properly executed search warrant of a cell phone with respect to MCPD's fraud and homicide investigation, an MCPD detective noticed a text message conversation between "Aaron" (believed to be JOHNSON) and "Money Makin Migo" (believed to be J.R.). As part of that text message conversation, the MCPD detective located a picture of a USPS blue collection box with an arrow key in the lock. The arrow key was a #248 series and the photo was dated February 18, 2020, which was the same day that a male subject attempted to open the second collection box in Arlington, Virginia, using a #248 series arrow key, but appeared to have gotten his key stuck in the lock. It also was the same day that Ward contacted JOHNSON after the #248 series arrow key became stuck in the collection box. During the text message conversation obtained by MCPD, "Aaron" and "Money Makin Migo" discussed how to remove keys that had become lodged in the locks of blue collection boxes. The MCPD detective identified "Aaron" as JOHNSON.



15. On or about May 25, 2020, at 1:31 a.m., a black Mercedes Benz sedan pulled up to the curb next to the blue collection boxes at the Arlington North Post Office. The passenger exited the vehicle and used an “arrow key” to open both collection boxes and placed the contents of each box into the vehicle. The passenger was wearing a hooded sweatshirt and sweatpants with the word “KENZO” on the right leg of his pants.



16. Prior to this theft, Active Global Positioning Device (“GPS”) trackers had been placed inside material within the collection box.¹ The GPS provided location data showing that a tracker was inside an apartment within building 2544 of the Rollingwood Apartments in Silver Spring, Maryland.

17. A license plate reader captured the travel of the Mercedes Benz from Arlington, Virginia, to Silver Spring, Maryland. The vehicle registration was registered to R.T. in Upper Marlboro, Maryland.

18. On or about May 25, 2020, investigators conducted surveillance in the area of the Rollingwood Apartments. Investigators located the Mercedes Benz parked on Spencer Road, which is adjacent to building 2544 of the Rollingwood Apartment. A silver Chevrolet Malibu (MD 3DY4727) was parked behind the Mercedes Benz. A database check performed on the Chevrolet Malibu license plate showed that it belonged on an Audi 4S, a vehicle registered to a female in Lanham, Maryland. A database check of the Vehicle Identification Number (VIN) revealed the Chevrolet Malibu is registered to an insurance company which has a mailing address in Dundalk, Maryland, and is associated with a company that auctions vehicles.

¹ Prior to the theft of the contents of both collection boxes on April 20, 2020, a Magistrate Judge for the Eastern District of Virginia authorized the placement of tracking in parcels. *See* 1:20-SW-502 and 1:20-SW-507. Pursuant to these warrants, a GPS tracker was placed in a parcel of mail in each collection box by law enforcement. A GPS is a satellite-based radio navigation system owned by the United States government and operated by the United States Air Force. It is a global navigation satellite system (GNSS) that provides geolocation and time information to a GPS receiver anywhere on or near the Earth where there is an unobstructed line of sight to four or more GPS satellites.



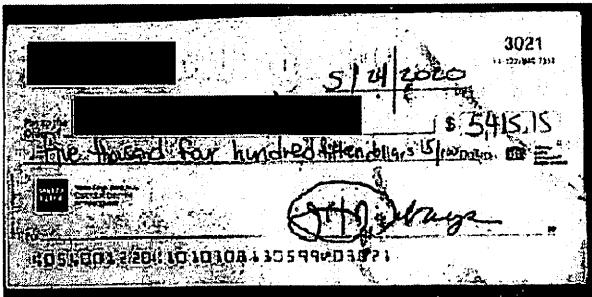
19. Records subpoenaed from Rollingwood Apartment indicated that the renter of apartment #102 inside building 2544 had been delinquent on rent payment since the lease began on January 1, 2020. Records also showed the rental application for apartment #102 was completed online using a stolen identity.

20. The victim of the stolen identity, V-1, confirmed that he did not complete the application for apartment #102, and added that he has never lived in Maryland or Virginia. The victim checked his credit report and found several instances of fraud related to apartment rental applications and an application for a credit card.

21. On or about June 15, 2020, the manager for the Rollingwood Apartments advised that he and another member of management entered apartment #102 and found it vacant except for a few items and a bag of trash. Accordingly, management changed the locks and took back possession of the apartment through an abandonment clause in their contract. The postal address of this residence is 2544 Ross Road, Apt #102, Silver Spring, MD 20910.

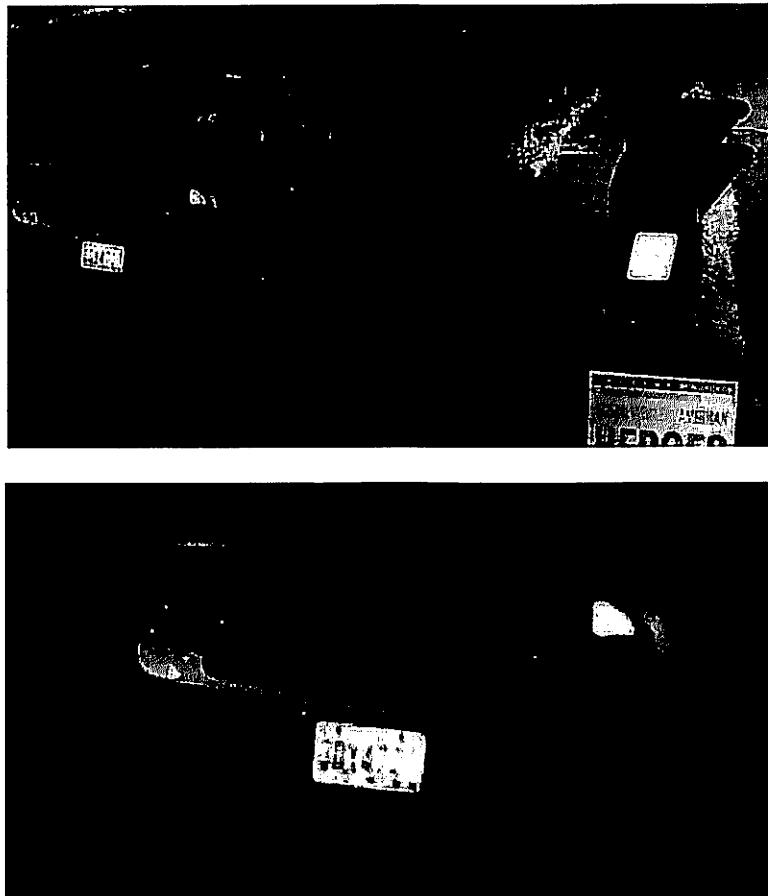
22. On or about June 16, 2020, I walked through the apartment with the manager and collected several items from the bag of trash, including: (1) a dental billing statement from a dental office located in Oxon Hill, Maryland, and addressed to AARON JOHNSON; (2) a State of Maryland Probation Card assigned to Probationer 041309200, later identified as being associated

with AARON JOHNSON; (3) a Notice of Delinquent Court Fines from Arlington County, Virginia, addressed to AARON JOHNSON; (4) a Notice of Collection from a debt collection company for a Red Light Camera Fine addressed to AARON JOHNSON; 5) a Wells Fargo bank card notice in the name of Subject 1 (S-1); and 6) a Wells Fargo check (#3021) from a resident of Arlington, Virginia, made payable to Victim 2 (V-2) for \$5,415.15.



23. Database checks on the aforementioned apartment number revealed an incident in March 2020, where S-1 called 911 to report a Domestic Dispute with her boyfriend. S-1 provided her address to the 911 operator as 2544 Ross Road, Apt #102, Silver Spring, Maryland, 20910. S-1's boyfriend, identified to police by S-1 as AARON JOHNSON, fled the scene before officers could interview him. S-1 told Montgomery County Police that JOHNSON choked her and punched her in the mouth before fleeing in his vehicle, which she described as a Gray Chevrolet Malibu with Maryland registration 3DY4727.

24. On or about November 2, 2020, mail was stolen from the blue collection boxes outside the Arlington North Post Office. The motion activated camera provided several photos showing a black male park and exit a Chevrolet Malibu vehicle with Maryland registration 3DY4727.



25. The male subject used an "arrow key" to open the collection boxes and place the contents of the plastic postal tubs into the passenger side of the vehicle. The subject was wearing sweatpants with the logo "KENZO" on the right left of his pants (picture 1), like the subject who stole the mail on or about May 25, 2020 (picture 2).

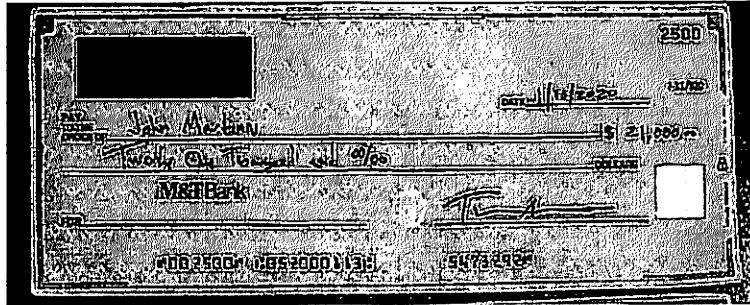


BANK FRAUD

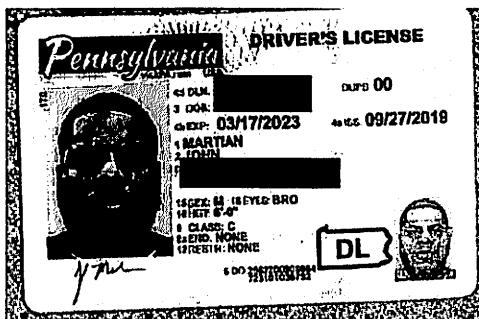
26. It has been my experience with investigating mail theft cases that checks found are frequently used to defraud banks. Checks contain bank routing and account number information and the means of identification of the authorized signors on the bank account. Stolen checks can be “washed” so that new fraudulent information can be entered on the checks. Additionally, counterfeit checks can be produced by using the stolen check’s bank routing and account number information and the means of identification of the authorized signors on the account. Conspirators can use false identification in the names of the account holders to defraud Federal Deposit Insurance Corporation (FDIC) insured financial institutions. Often, conspirators recruit individuals through social media to negotiate, on their behalf, counterfeit checks at banks.

27. Further, it has been my experience that individuals who engage in this type of criminal activity, use devices such as cell phones to conduct business, store documents and correspondence involving co-conspirators, text or other “Short Message Service” (“SMS”) messages, access websites to facilitate illegal activity, store contact information of co-conspirators, including telephone numbers, email addresses, identifiers for instant messenger and social media accounts; stolen financial and personal identification data, including bank account numbers, credit card numbers, and names, addresses, telephone numbers, and social security numbers of other individuals; and records of illegal transactions using stolen financial and personal identification data, to, among other things, (1) keep track of co-conspirator’s contact information: (2) keep a record of illegal transactions for future reference; (3) keep an accounting of illegal proceeds for purposes of, among other things, splitting those proceeds with co-conspirators: and (4) store stolen data for future exploitation.

28. On or about January 16, 2020, JOHNSON and his girlfriend, S-1, were arrested at an M&T Bank by the Hagerstown, Maryland Police Department, for attempting to cash a counterfeit check in the amount of \$21,000. The check was counterfeited using the business account of Victim 1 (V-1), and made payable to “John Martian”. The owner of the business (V-1), an Arlington, Virginia resident, advised that although the original check was intended for a client in Texas, it was not made payable to “John Martian”. V-1 also added that the check never made it to its destination. According to V-1, he placed the original check into the mail-stream in Arlington, Virginia, using the outdoor blue collection boxes located at the Arlington North Post Office, located at 2200 North George Mason Drive, Arlington, Virginia, 22207.



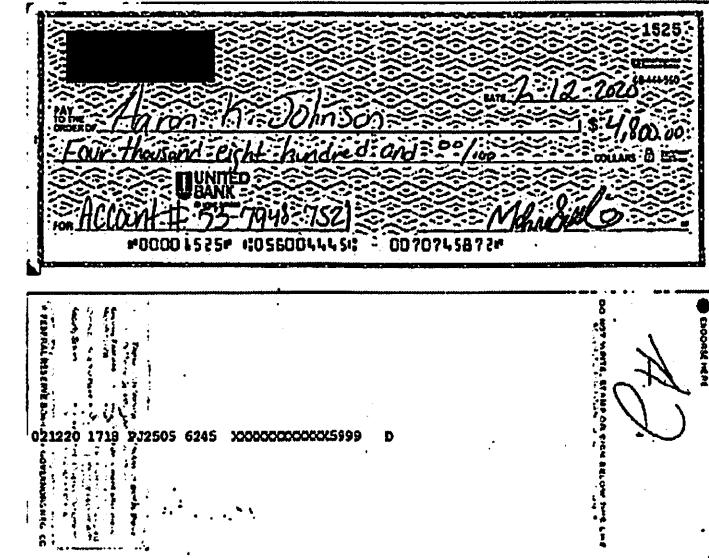
29. In Johnson's possession at the time of his arrest was a Pennsylvania Driver's License in the name of "John Martian".



30. On or about July 15, 2020, a PNC Bank Fraud Analyst was contacted regarding a bank account previously owned by AARON JOHNSON that had been closed by PNC in or around April 2020, due to fraud. The analyst advised that there were three checks that were deposited into JOHNSON's PNC Bank Checking account, and that all were returned either due to insufficient funds or because they were considered "altered/fictitious". The three checks were owned by residents of Arlington, Virginia. Below is an account of the three checks:

Check #1525

31. On or about February 12, 2020, PNC Bank check #1525, made payable to AARON JOHNSON for \$4,800, was deposited into JOHNSON's PNC Bank Checking account ending in #7521, using JOHNSON's PNC debit card. The check was endorsed "A.J." before it was deposited. The check was written off of an account belonging to an Arlington business, identified as Victim 4 (V-4).



32. The check deposit was made using the PNC Bank drive up ATM located at 9400 Taj Lane, Glenarden, Maryland. A PNC Bank external camera captured a photo of the vehicle at the time of the deposit. The vehicle was a gray Chevrolet Malibu bearing Maryland registration 3DY4727.

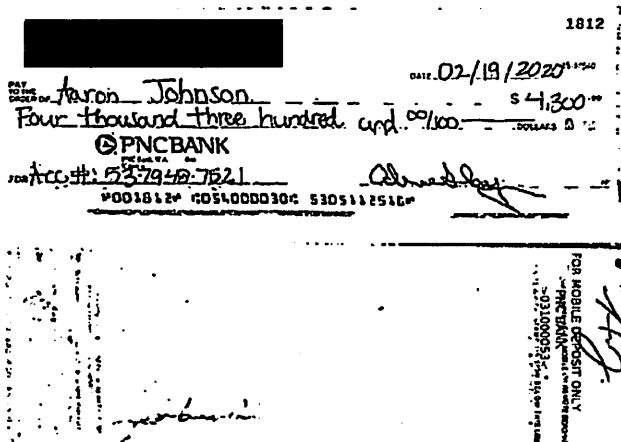


33. On or about July 14, 2020, the manager for the business (V-4), was interviewed regarding check #1525. According to V-4, the aforementioned check was originally made payable to a company based in Washington, D.C. for \$5,200, and was intended as payment for rent. V-4 added that at least three other checks written off of the same account went "missing" in the mail stream and did not get to their intended destination. V-4 stated that he usually uses the blue

collection boxes across the street from his business, which is in front of the U.S. Post Office located at 235 N. Glebe Road, Arlington, Virginia, 22203.

Check #1812

34. On or about February 19, 2020, PNC Bank check #1812, made payable to AARON JOHNSON for \$4,300, was deposited into JOHNSON's PNC Bank Checking account ending in #7521, via mobile deposit. The check was endorsed "A.J." before it was deposited. The check was written off of a business account, identified as Victim 5 (V-5), which has an Arlington, Virginia address.

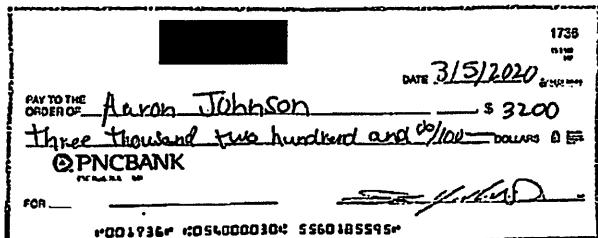


35. On or about July 31, 2020, the owner of the business (V-5) was interviewed by telephone. V-5 advised that the original check was made payable to a utility company for \$55.14. V-5 added that the check was intended to pay the electric bill for a family property located in New Jersey. V-5 could not remember exactly where he placed the original check into the mail-stream, but added that he uses several post offices in the Arlington, Virginia area.

Check #1736

36. On or about March 6, 2020, PNC Bank check #1736, payable to AARON JOHNSON in the amount of \$3,200, was deposited into JOHNSON's PNC Bank Checking

account ending in #7521, via mobile deposit. The check was endorsed "A.J." before it was deposited. The check was written off of a business account, identified as Victim 6 (V-6), which has an Arlington, Virginia address. To date, investigators have been unable to interview anyone associated with the V-6 business.



CONCLUSION

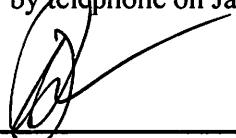
37. Based on the foregoing, I submit there is probable cause to conclude that from in or around December 2019 through in or around November 2020, in Arlington County, within the Eastern District of Virginia, and elsewhere, AARON JOHNSON did knowingly combine, conspire, confederate, and agree with others, known and unknown, to commit bank fraud, in violation of 18 U.S.C 1349.

Respectfully submitted,



Inspector Steve Donaghey
U.S. Postal Inspection Service

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P. 4.1
by telephone on January 26, 2021.

 /s/
Theresa Carroll Buchanan
United States Magistrate Judge

The Honorable Theresa Carroll Buchanan
United States Magistrate Judge
Alexandria, Virginia